



ENZYMATIC THERAPY

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INTEGRATIVE THERAPEUTICS INC.™

NF Formulas PhytoPharmica
Tyler Encapsulations Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 F: 503.582.0467

ENZYMATIC THERAPY®

&
PHYTOPHARMICA®

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 F: 888.570.6460 (Enzymatic)
P: 920.469.9099 F: 920.469.4418 (Phyto)

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January 17, 2006

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Esberitox®	Increases rate of phagocytosis in neutrophils*	Wild indigo (Baptisia tinctoria) Root, Echinacea purpurea and pallida Root (Coneflower root), Thuja (Thuja occidentalis) Leaf (White cedar leaf)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: Robert Doster
Robert Doster
Title: Senior Vice President of Scientific Affairs
Date: 1-17-06

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,
Michael P. Devereux
Michael P. Devereux
Chief Financial Officer

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MANUFACTURED, PACKED, AND/OR DISTRIBUTED BY

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Esberitox®	Activates macrophages*	Wild indigo (Baptisia tinctoria) Root, Echinacea purpurea and pallida Root (Coneflower root), Thuja (Thuja occidentalis) Leaf (White cedar leaf)

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Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: _____

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Esberitox®	Increases interleukin-2 production*	Thuja (Thuja occidentalis) Leaf (White cedar leaf)

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Date: _____

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Esberitox®	Enhances T-4 helper cells*	Thuja (Thuja occidentalis) Leaf (White cedar leaf)

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Esberitox®	Stimulates B-cell and antibody production*	Wild indigo (Baptisia tinctoria) Root, Thuja (Thuja occidentalis) Leaf (White cedar leaf)

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Esberitox®	Increases interferon production*	Wild indigo (Baptisia tinctoria) Root, Thuja (Thuja occidentalis) Leaf (White cedar leaf)

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January 16, 2006

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Esberitox®	Clinically proven and effective immune system stimulation.*	Wild indigo (Baptisia tinctoria) Root, Echinacea purpurea and pallida Root (Coneflower root), Thuja (Thuja occidentalis) Leaf (White cedar leaf)

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